

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

| | | |
|--------------------------|---|-------------------------------|
| UNITED STATES OF AMERICA | : | Criminal No. 1:00-CR-00004-01 |
| | : | |
| v. | : | (Chief Judge Yvette Kane) |
| | : | |
| NAKIA JEFFRIES | : | (Electronically Filed) |

SUPPLEMENT TO PRO SE MOTION FOR
REDUCTION UNDER 18 U.S.C. § 3582(c)

AND NOW comes Nakia Jeffries , by his attorney, James V. Wade, of the Federal Public Defenders Office, and files this Supplement to the Pro Se Motion for Reduction Under 18 U.S.C. § 3582(c). In support thereof, it is averred as follows:

1. On January 11, 2008 Nakia Jeffries filed a pro se motion to reduce sentence in connection with the newly announced retroactive crack cocaine guideline range reductions.
2. The Government filed a Reply Brief to Nakia Jeffries' pro se motion agreeing that Nakia Jeffries is entitled to request a reduction of sentence.

3. On March 5, 2008 the Federal Public Defender's Office was appointed to represent Nakia Jeffries pursuant to this Court's Standing Order.

4. On March 7, 2008, the Probation Office filed an Addendum to the original Presentence Report in Mr. Jeffries' case.

5. The undersigned counsel has reviewed the above referenced filings and agrees that Nakia Jeffries is eligible for a two level reduction in his previous offense level.

6. Nakia Jeffries' prior total offense level was 31. His new total offense level is 29.

7. His criminal history category of V remains the same.

8. The original sentencing guideline range was 168 months to 210 months.

9. His new imprisonment range is 140 months to 175 months.

10. On October 30, 2000 this Court sentenced Nakia Jeffries to a term of imprisonment of 168 months.

11. If the Court were to sentence at the bottom end of the new guideline range, Nakia Jeffries' sentence would be 140 months.

12. The difference between the bottom end of the two ranges is 28 months.

13. Nakia Jeffries' projected release date is February 23, 2012.

14. Counsel estimates that Nakia Jeffries would be released in February of 2010 if the Court reduced his sentence to 140 months. Thus, this is not a time served case.

WHEREFORE, it is respectfully requested that this Honorable Court grant Nakia Jeffries' Pro Se Motion to Reduce Sentence Under 18 U.S.C. § 3582(c).

Respectfully submitted,

Date: March 18, 2008

s/ James V. Wade

JAMES V. WADE, ESQUIRE

Federal Public Defender

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Attorney for Nakia Jeffries

CERTIFICATE OF SERVICE

I, James V. Wade, Federal Public Defender for the Middle District of Pennsylvania, do hereby certify that I served a copy of the foregoing **SUPPLEMENT TO THE PRO SE MOTION TO REDUCE SENTENCE UNDER 18 U.S.C. § 3582(c)(2)**, via Electronic Case Filing, or by placing a copy in the United States mail, first class in Harrisburg, Pennsylvania, addressed to the following:

Martin A. Carlson, Esquire

[REDACTED]
[REDACTED]
[REDACTED]
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William A. Behe, Esquire

[REDACTED]
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Drew Thompson

[REDACTED]
[REDACTED]
[REDACTED]

Nakia Jeffries

[REDACTED]
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Date: March 18, 2008

s/ James V. Wade

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